

**EXHIBIT 1**

Stipulation

(Attached)

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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In re	:	Chapter 11
	:	
CarePoint Health Systems Inc. d/b/a Just Health	:	Case No. 24-12534 (JKS)
Foundation, et al. <sup>2</sup>	:	
	:	Jointly Administered
Debtors.	:	
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**STIPULATION REGARDING MATTERS SCHEDULED  
FOR HEARING ON DECEMBER 16, 2024**

This stipulation (the “Stipulation”) is entered into as of November 27, 2024, by and among the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), the Official Committee of Unsecured Creditors (the “Committee”), Bayonne Medical Center Opco, LLC (and together with Hudson Regional Hospitals, LLC and certain of their affiliates, “HRH”), Insight Management and Consulting Services, Inc. (“Insight”), BMC Hospital, LLC (“BMC”), and Strategic Ventures, LLC (“Strategic Ventures”) (collectively, the “Parties”), by and through their respective undersigned counsel, based on the following:

WHEREAS, on November 25, 2024, the Court held a status conference in the above-captioned cases and scheduled for **December 16, 2024, at 9:30 a.m. (Eastern)** hearings on (i)

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<sup>2</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

the *Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral* [Filed 11/03/2024, D.I. 10]; (ii) the *Motion of IJKG Opco, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral* [Filed 11/03/2024, D.I. 11], as amended by [D.I. 68, Filed: 11/06/2024]; (iii) the *Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A Final Order Approving A Private Sale of All Or Substantially All Assets of IJKG Opco, LLC and IJKG, LLC and (C) Granting Related Relief* [Filed: 11/04/2024, D.I. 18]; and (iv) the *Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief* [Filed: 11/04/2024, D.I. 19] (collectively, items (i), (ii) and (iii), the “Motions”); and

WHEREAS, the Parties have met and conferred regarding the discovery and briefing schedule in connection with the Motions.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and among the Parties, through their respective undersigned counsel, as follows:

1. The objection deadline for each of the Motions shall be **December 9, 2024**, provided that the Parties may file supplemental objections to the Motions based on testimony adduced during depositions no later than **4:00 p.m. on December 11, 2024**.

2. Subject to Court approval, the hearing scheduled for **December 10, 2024, at 10:30 a.m. (Eastern)** shall proceed as a status conference with respect to the Motions.

3. No later than **November 27, 2024**, (A) the Debtors shall complete substantially all of their production (the “**Strategic Ventures Production**”) in response to the document requests propounded by Strategic Ventures on November 13, 2024; and (B) the Debtors and HRH shall (i) complete their initial productions (together with the Strategic Ventures Production, the “**Productions**”) in response to the initial document discovery requests propounded by Insight and BMC, and joined by the Committee (the “**Requestors**”), as prioritized by agreement of the Parties on November 24, 2024, and (ii) provide to the Requestors the list of custodians and search terms used by the Debtors and HRS to collect the documents included in their initial productions. All rights of the Requestors to challenge the custodians and search terms utilized to collect and produce the ESI after the Debtors and HRH disclose same as set forth above are expressly reserved. All Productions of electronically stored information (“**ESI**”) shall be in native file format and consistent with typical and customary protocols for production of ESI in discovery. To the extent that any Production has been made prior to the date hereof in a manner inconsistent with the foregoing sentence, such Production shall be promptly corrected so that it will be in native file format and consistent with typical and customary protocols for production of ESI in discovery.

4. The Debtors shall produce their Rule 30(b)(6) representative for a deposition (the “Debtors’ 30(b)(6) Deposition”) on December 5, 2024, starting at 8:00 a.m. at the offices of the Committee’s counsel in Newark, New Jersey, to the extent that the Productions are effectuated consistent with paragraph 3 hereof. To the extent that the Productions are not materially complete, the Debtors’ 30(b)(6) Deposition shall be conducted at a date and time mutually convenient for the Parties.

5. The Debtors shall produce Dr. Moulick for a deposition on December 9, 2024, starting at 10:00 a.m. at the offices of the Committee’s counsel in Newark, New Jersey.

6. HRH shall produce its Rule 30(b)(6) representative for a deposition (the “HRH 30(b)(6) Deposition”) on December 6, 2024, starting at 10:00 a.m. at the offices of the Committee’s counsel in Newark, New Jersey, to the extent that the Productions are effectuated consistent with paragraph 3 hereof. To the extent that the Productions are not materially complete, the HRH 30(b)(6) Deposition shall be conducted at a date and time mutually convenient for the Parties.

7. To the extent the Debtors serve notices of deposition of representatives of Insight and BMC, such depositions shall take place on the dates to be agreed by the Parties, provided that such depositions shall not be noticed or occur at any time before the December 16<sup>th</sup> hearing.

8. To the extent any discovery disputes arise, the Parties shall meet and confer in an effort to resolve or narrow any such disputes. In the event any dispute is unable to be resolved, the Parties may seek an expedited determination from the Court.

9. The Parties shall meet for a settlement conference on **December 10, 2024**, at the offices of the Committee’s counsel in Wilmington, Delaware promptly after the conclusion of the Court’s status conference in these cases set for such date.

10. This Stipulation constitutes the complete express agreement of the Parties and no modification or amendment to this Stipulation shall be valid unless it is in writing, signed by the Parties, and approved by the Court.

11. This Stipulation shall remain binding on the Parties and all of their successors and assigns.

12. This Stipulation shall become effective upon the Court's entry of an order approving the Stipulation.

13. The Court shall retain jurisdiction to hear and to determine all matters arising from or related to this Stipulation.

[Signature pages follow]

DATED: November 27, 2024

CONSENTED AND AGREED TO BY:

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